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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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February 28, 2001

Mr. Keith Klein
U.S. Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Mr. Ron Hanson
Fluor Hanford, Inc.
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Mr. Michael Hughes
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Dr. Lura Powell
Pacific Northwest National Laboratory
P.O. Box 999, MSIN: K1-46
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Ms. Mary P. DeLozier
CH2M HILL Hanford Group, Inc.
P.O. Box 1500, MSIN: H6-08
Richland, Washington 99352-1505

RECEIVED
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EDMC

Dear Messrs. Klein, Hanson, Hughes, Dr. Powell, and Ms. DeLozier:

This letter transmits the *Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit for the Treatment, Storage, and Disposal (TSD) of Dangerous Waste* (Permit), Revision 7. The associated Responsiveness Summary is also enclosed.

Also enclosed is an updated Permit Applicability Matrix (Attachment 3 to the Permit, and an updated Permit Modification Schedule (Attachment 27 to the Permit).

The following is a summary of changes made to the Permit for Modification E. Documentation detailing these changes is also enclosed.

Introduction

- Language was added to clarify that closure requirements will be included in Part III for TSD units with operating permits.

Part III, Unit Specific Conditions for Final Status Operations

- Two new chapters and conditions were added: Chapter 7 (Waste Receiving and Processing Plant) and Chapter 8 (Central Waste Complex).
- Class 3 modifications were incorporated into Chapter 1 (616 Nonradioactive Dangerous Waste Storage Facility). The modification focused on the closure of this facility.

Part V, Unit-Specific Conditions for Units Undergoing Closure

- Two new chapters and conditions were added: Chapter 20 (300 Area Waste Treatment System) and Chapter 21 (2401-W Waste Storage Building).

Attachment 3, Permit Applicability Matrix

- Entries were made to reflect the addition of new Chapters to Parts III and V.
- The draft Applicability Matrix for Modification E was issued on September 29, 1999. However, the Applicability Matrix was revised on March 28, 2000, to reflect the addition of Corrective Action conditions to the Permit. As a result, the Applicability Matrix included with Modification E (Revision 7) also reflects the March 28, 2000, revisions.

Attachment 27, Permit Modification Schedule

- The Transuranic Storage and Assay Facility (TRUSAF) was retained on the Permit Modification Schedule. A compliance schedule was added for TRUSAF to schedule transition negotiations by December 31, 2001.
- Final status permitting of the Double-Shell Tank (DST) System has been moved from Modification F to Modification G. However, Ecology realizes that the DST System schedule has slipped and will not be included with Modification G. A new final status permit schedule will be developed for the DST System and included with Modification F.
- The Canister Storage Building and Immobilized Low Activity Waste Storage Facility are currently scheduled for final permitting in 2003. Ecology, the U.S. States Department of Energy (USDOE), and contractors are having discussions about the permit schedules for these two units.
- The Permit Modification Schedule has been updated to identify TSD units to be added to the Permit through 2004.

Attachment 45 (enclosed), Selecting a Laboratory and Quality Assurance/Quality Control, has been added to the Permit.

Miscellaneous Changes

- Several minor changes were made throughout the Permit for grammar and consistency in presentation.
- All Class 1 modifications approved by Ecology through the quarter ending September 30, 2000, were incorporated into Revision 7.
- The list of acronyms, list of attachments, and table of contents were updated.

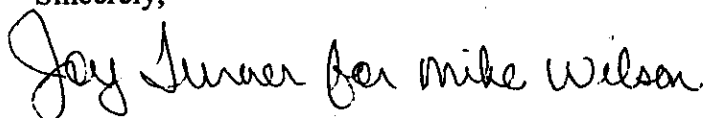
As you know, the March 28, 2000, modification made to the Permit transferring corrective action conditions from the Federal to the State portion of the permit was appealed by USDOE to the Pollution Control Hearings Board. On December 8, 2000, USDOE and Ecology settled the appeal; however, those conditions modified by the Stipulation and Agreed Order of Dismissal are subject to public comment, which is scheduled to begin in March 2001. Because the modified conditions are not yet final, the attached Permit still reflects the Corrective Action

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conditions as issued on March 28, 2000. Ecology plans to incorporate the settlement changes, pending the outcome of any public comments received, in the next Permit modification (i.e., Modification F).

If you have any questions regarding the above modifications, please contact Laura Ruud at (509) 736-5715.

Sincerely,

A handwritten signature in cursive script that reads "Jay Turner for Mike Wilson".

Michael Wilson
Program Manager
Nuclear Waste Program

MW:LR:lkd

Enclosures:

- (1) Responsiveness Summary (with Appendix)
- (2) RCRA Permit, Revision 7
- (3) Permit Applicability Matrix (Attachment 3)
- (4) 616 Nonradioactive Dangerous Waste Storage Facility Closure Plan and permit modification forms (Attachment 8)
- (5) Permit Modification Schedule (Attachment 27)
- (6) Waste Receiving and Processing Facility Part A and B (Attachment 43)
- (7) Central Waste Complex Part A and B (Attachment 44)
- (8) "Selecting a Laboratory and Quality Assurance/Control" (Attachment 45)
- (9) 300 Area Waste Acid Treatment System Closure Plan (Attachment 46)
- (10) 2401-W Waste Storage Building Closure Plan (Attachment 49)
- (11) Class 1 Permit Modifications through September 30, 2000

cc: Dave Bartus, EPA
Doug Sherwood, EPA
Cliff Clark, USDOE
Joel Hebdon, USDOE
Walt Pasciak, USDOE
Steve Wisness, USDOE
Joan Bartz, FH
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Sue Price, FH
Harold Tilden, PNNL
Mary Lou Blazek, OOE
Administrative Record: Site-Wide Permit
cc/enc: Suzette Thompson, FH